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Attorneys for Defendant
CITY AND COUNTY OF HONOLULU

IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF HAWAII

THE ESTATE OF ERIC A.
 POWELL, THROUGH PERSONAL
 REPRESENTATIVE MARY K.
 POWELL; THE ESTATE OF
 JAMES D. LAUGHLIN, THROUGH
 PERSONAL REPRESENTATIVE
 RAGINAE C. LAUGHLIN; MARY K.
 POWELL, INDIVIDUALLY;
 REGINAE C. LAUGHLIN,
 INDIVIDUALLY; CHLOE
 LAUGHLIN, A MINOR, THROUGH
 HER NEXT FRIEND, REGINAE C.
 LAUGHLIN,

Civil No. CV04 00428 DAE-LEK
 DEFENDANT CITY AND COUNTY
 OF HONOLULU'S FIRST
 SUPPLEMENTAL RESPONSE TO
 PLAINTIFFS' FIRST REQUEST
 FOR PRODUCTION OF
 DOCUMENTS TO DEFENDANT
 CITY AND COUNTY OF
 HONOLULU DATED
 DECEMBER 21, 2004
 [Date Stamp 00001 - 00164]

Plaintiffs,

vs.

CITY AND COUNTY OF
 HONOLULU,

Defendants.

L/Powell/

EXHIBIT "38"

11. Please produce all documents related to any City and County Hanauma Bay employee manual, instructions or procedures related to any employee position in the vicinity of the beach, including any such documents related to Daniel Neves, Ron Brogham, William Goodwin and Robb Dorr's positions as well as the Lifeguard and Beach Information Manager position.

Answer:

Objection. Overly broad. Unduly burdensome. Vague and ambiguous. Violates copyright laws.


Derek T. Mayeshiro

See attached documents.

12. Please produce all documents or signage related to any City warnings or safety instructions related to the hotel pool or the ocean, including any warnings or instructions that were allegedly given to Plaintiffs.

Answer:

Objection. Overly broad. Unduly burdensome. Vague and ambiguous.


Derek T. Mayeshiro

See attached documents.